

In the United States District Court
for the Western District of Pennsylvania

Ryan Herwin

: case # 05-93 ER/E

:

vs.

: Magistrate Judge Susan Baxter

:

Lt. William McConnell

: District Judge Sean McLaughlin

Plaintiff's First Set of Interrogatories

In accordance with Rule 33 of the Federal Rules of Civil Procedure, plaintiff requests that the defendant answer the following interrogatories separately and fully in writing under oath, and that the answers be signed by the defendant and served on plaintiff within 30 days of service hereof.

In responding to these interrogatories, furnish all information which is available to you, including information in the possession of your attorneys or investigators for your attorneys and not merely information known of your own personal knowledge.

These interrogatories shall be deemed continuing, so as to require supplemental answers as new and different information materializes.

1. Did you interview any other prisoners in regards to plaintiff's harassment claims that were on the transfer bus from Smithfield to Albion on July 15, 2003 besides William Clark?

A) If so, what were these inmates names and what did each of them tell you?

2. What were the names of each and every prisoner who was on the transfer bus from Smithfield to Albion, including those dropped off at other prisons on the way from Smithfield to Albion, on July 15, 2003?

(specify which inmates were transferred to Albion and which ones were dropped off at the other prisons. In doing so cite the name of the other prisons for each individual prisoner.)

12/10/05

Ryan Herwin